



Figure 2- St. George UT and Las Vegas NV PEAs

By allocating PALs based on Partial Economic Areas (PEA), only large carriers will be able to acquire PALs and will result in wasted spectrum for areas that will likely never be serviced. By retaining the existing rules, smaller innovative companies like ours will be able to compete for smaller, underserved areas, while larger carriers can focus their investments on high-density areas where they currently need more spectrum allocation.

At this point we continue to investigate CBRS options including LTE and 5G for future use, but we cannot make rational investments based on the uncertainty of the proposed rule changes. InfoWest opposes the proposals to increase the size of the PALs to the size of a PEA. We do eagerly anticipate being able to bid on smaller census tract-sized PALs. Please allow us to continue to invest and innovate on behalf of the under-served populations in the desert southwest.

Sincerely,

Randy Cosby
Vice President
InfoWest, Inc.

